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United States Attorney

District of Oregon

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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**Case No. 3:22-cv-01785-MO**

**v.**

**\$25,619.00 IN UNITED STATES  
CURRENCY, *in rem*,**

**COMPLAINT *IN REM* FOR  
FORFEITURE**

**Defendant.**

Plaintiff, United States of America, by Natalie K. Wight, United States Attorney for the District of Oregon, and Katherine C. de Villiers, Assistant United States Attorney, for its Complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 18 U.S.C. § 981; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendant, *in rem*, \$25,619.00 U.S. currency, was seized in the District of Washington, and is now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendant, *in rem*, \$25,619.00 U.S. currency, constitutes or is derived from proceeds traceable to the violations of 18 U.S.C. § 1349 (Conspiracy to Commit Bank Fraud) and is forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the Declaration of Special Agent Lindsay Wills, Homeland Security Investigations, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, Plaintiff, United States of America, prays that due process issue to enforce the forfeiture of Defendant, *in rem*, \$25,619.00 U.S. currency; that due notice be given to all interested persons to appear and show cause why forfeiture of this Defendant, *in rem*, should not be decreed; that due proceedings be had thereon; that this Defendant be forfeited to the United States; that the Plaintiff United States of America be awarded its costs and disbursements incurred in this.

Dated: November 15, 2022.

Respectfully submitted,

NATALIE K. WIGHT  
United States Attorney

/s/ Katie de Villiers  
KATHERINE C. DE VILLIERS  
Assistant United States Attorney

## **VERIFICATION**

I, Lindsay Wills declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with Homeland Security Investigations and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

/s/ Lindsay Wills  
**LINDSAY WILLS**  
Special Agent  
Homeland Security Investigations